

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IVAN SANTIAGO,	)	
Plaintiffs,	)	C.A No. 04-10746-JLT
	)	
v.	)	
	)	
WILLIAM J FEENEY, MARCUS,	)	
EDDINGS, and the CITY OF BOSTON,	)	
Defendants	)	
	)	

**PLAINTIFF'S REQUEST FOR VOIR DIRE QUESTIONS**

Now comes the plaintiff, and moves that all the prospective jurors undergo individual voir dire as to the following questions in order to determine if they are unbiased jurors. Pursuant to such examination, the plaintiff moves that the following brief statement of facts of the case be put to the jurors.

In this case, the plaintiff Ivan Santiago alleges that on March 20, 2003, at 58 Cheney Street in Dorchester, defendant police officer Marcus Eddings subjected him an illegal search of his anal cavity.

The defendant denies this allegation.

**PROPOSED VOIR DIRE**

1. Have you, any members of your family, or any close friends ever held a job in law enforcement?
2. Have you, any member of your family, or close friends been employed by or worked for the City of Boston? If so, who, when, and in what capacity?
3. Are you more likely to believe the testimony of a police officer simply because that person is a police officer?

4. If, after hearing the evidence and the instructions of the judge, you found that a police officer had violated plaintiffs' rights, would anything cause you to hesitate to make him pay money damages to the person suing him?
5. Do you believe that someone who is found in the same apartment as a drug dealer must be guilty of at least something?
6. Do you feel that a person should be compensated for emotional distress that another person wrongfully causes him or her?
7. If the judge were to instruct you that such compensation was proper under the law, would you have any hesitation about making such an award if the evidence warranted it?

Respectfully submitted,  
The Plaintiff Ivan Santiago,  
By his attorneys,

//s// Jessica D. Hedges  
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**CERTIFICATE OF SERVICE**

I, Jessica D. Hedges, hereby certify that on this 3rd day of November, 2006, I have served a copy of the foregoing, where unable to do so electronically, via United States, First-Class Mail, postage prepaid, to all counsel of record in this matter.

//s// Jessica D. Hedges  
Jessica D. Hedges